

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION)
SERVICE CHANGES, 2012)
)

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE INTERROGATORIES TO AMERICAN POSTAL
WORKERS UNION, AFL-CIO, WITNESS SCHILLER, APWU-RT-2
USPS/APWU-RT2—1-5**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of
Practice and Procedure, the Postal Service respectfully submits the following
interrogatories to APWU witness Schiller (APWU-TR2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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INSTRUCTIONS AND DEFINITIONS

A. Instructions

1. These interrogatories impose a continuing obligation to respond and to provide additional information as it becomes available.
 2. If no information or documents are responsive to any of these interrogatories, please indicate the lack of responsive information or documents.
 3. For each interrogatory, please identify the preparer or the person who supervised the response.
 4. Please specify the interrogatory to which each document applies. If a document or narrative response applies to more than one interrogatory, please provide a cross reference.
 5. For an interrogatory calling for the production of documents, please provide legible, true and complete copies of the documents. If a responsive document has been lost or destroyed, or is otherwise unavailable, please follow Instruction 11 below.
 6. Where an interrogatory solicits a narrative response rather than the production of documents alone, a narrative response is required and the production of documents does not substitute for a narrative response.
 7. These interrogatories are to be construed broadly to elicit all requested information which is discoverable under the Commission's Rules of Practice.
- Accordingly,
- (a) The present tense includes the past tense and the past tense includes the present tense; and

- (b) The singular includes the plural and the plural includes the singular.

8. If any responsive information is not available in the form requested, please provide the available information or documents which best respond to the interrogatory.

9. These interrogatories apply to all responsive information and documents in your possession, custody and control, or in the possession, custody or control of your attorneys, witnesses or other agents, from all files, wherever located, including active and inactive files and including electronic files.

10. If any responsive information or document is not in your possession, custody or control, but you know or believe that it exists, please identify the information or document and indicate to the best of your ability the location and custodian of the information or document.

11. If any document responsive to any of these interrogatories has been destroyed or is otherwise unavailable, please identify and describe:

- (a) The subject matter and content of the document;
- (b) All persons involved in the destruction or removal of the document;
- (c) The date of the document's destruction or removal; and
- (d) The reasons for the destruction or other unavailability of the document.

12. If you assert any claim of privilege or discovery immunity in response to any interrogatory, please identify each document withheld and state:

- (a) The document's title and type;
- (b) The privilege or immunity claimed and the basis for claiming such

privilege or immunity;

- (c) Each person who prepared, signed or transmitted the document;
- (d) Each person to whom the document, or any copy of the document was addressed or transmitted;
- (e) The date of the document; and
- (f) The subject matter of the document.

13. For each response which is generated by a computer or electronic data storage mechanism, please state:

- (a) The name of the file from which the response came;
- (b) How the data are stored (disks, tapes, etc.);
- (c) How the data are transmitted and received; and
- (d) The name of each person who collected the data or entered the data into the computer or electronic data storage mechanism.

14. For any interrogatory with subparts, please provide a complete separate response to each subpart as if the subpart was propounded separately.

15. If information or documents responsive to any of these interrogatories has previously been provided in this proceeding in response to an interrogatory by any participant, please provide a specific cross-reference. There is no need to make a duplicate response.

16. If you perceive any ambiguity in interpreting any interrogatory or any instruction or definition applicable to an interrogatory, please secure a clarification from counsel for the United States Postal Service as soon as the ambiguity is perceived.

B. Definitions

1. “Communication” means any correspondence, contact, discussion or exchange between any two or more persons. The term includes, but is not limited to, all documents, telephone conversations or face-to-face conversations, electronic mail, conferences or other meetings.

2. “Document” means any written, recorded, computer-stored, computer-generated or graphic material however stored, produced or reproduced. The term is to be construed to the full extent of the definition in Rule 34 of the Federal Rules of Civil Procedure. Any document that is not exactly identical to another document for any reason, including but not limited to marginal notations or deletions, is a separate document.

3. “Each” includes the term “every” and “every” includes the term “each.” “Any” includes the term “all” and “all” includes the term “any.” “And” includes the term “or” and “or” includes the term “and.”

4. “Identify” means to state as follows:

(a) With respect to a document and to the extent that the following information is not readily apparent from the document itself: (i) the document’s title, date, author(s), signer(s), sender(s), addressee(s) and recipient(s); (ii) the type of document (e.g. letter, memorandum, agreement, invoice) its location and custodian; and (iii) a detailed description of its contents or principal terms and provisions.

(b) With respect to a communication and to the extent the following information is not readily apparent: (i) the time, date and place of the

communication; (ii) all maker(s) and recipient(s) of the communication; (iii) the mode of communication; (iv) the subject matter of the communication; and (v) any document generated in connection with the communication.

(c) With respect to a person and to the extent the following information is not readily apparent: (i) the person's full name; (ii) the person's employer, job title, and a description of the person's current duties and those duties at the time of deletion or destruction; and (iii) the person's business address.

5. "You" and "your" refers to William Weed, as indicated by the context of the question.

6. The terms "related to," "relating to" or "in relation to" mean being in any way relevant to, commenting on, consisting of, referring to, composing, comprising, discussing, evidencing, identifying, involving, reflecting, or underlying.

7. The terms "state," "describe" and "explain" call for answers independent from any documents that are required in response to these interrogatories. Such answers should be in a form (e.g., narrative, tabular) appropriate for a complete response to the interrogatory.

8. "USPS" or "Postal Service" refers to the United States Postal Service, including USPS Headquarters and any subordinate department, division, or office of the USPS, whether at the national, area, district or local level. This definition includes the officers, directors, agents and employees of the United States Postal Service and its Board of Governors.

9. “Your testimony” refers to the Testimony of William Weed on Behalf of the Postal Regulatory Commission, filed with the Postal Regulatory Commission on April 22, 2012.

INTERROGATORIES

USPS/APWU-RT2-1. Please refer to page 9, lines 2-3 of your testimony. Please identify each document you reviewed in preparation for your testimony by title (supply a descriptive name if necessary), author, date, how you accessed each, and how it can now be accessed. Please provide separate lists of those filed in this case and other documents. For case documents, include in the listing for each the date on which it was filed, the filing party, and the type of document.

USPS/APWU-RT2-2. Please refer to page 9, lines 4-5 AND 8-11 of your testimony. Please identify each secondary source that you reviewed using the descriptors delineated in USPS/APWU-TR-1.

- a. Please provide a copy of the data you obtained from “a respected industry source” and file it as a library reference.
- b. In what form have you “combined” the data you collected and reviewed?
- c. If you developed a qualitative and/or quantitative report, please supply a copy of it in response to this interrogatory. If you developed quantitative results, please provide them and document them in terms envisioned by Rule 31(k) (which allows a third party to replicate the results from raw data, through all processing steps, to your final quantitative outputs).

USPS/APWU-RT2-3. Please refer to page 9, lines 6-7 of your testimony. Please provide complete documentation of your “modeling effort,” including those by which that effort was “commissioned,” together with your results, the resultant model, the output of such modeling, any interim or final results, and any reports generated during examination or development of the model. Please also provide any contractual documents underlying that modeling effort.

USPS/APWU-RT2-4. On page 9 of your testimony you first introduce the conduct of “In Depth Interviews (‘IDIs’).” Please document these IDIs completely—to the extent not already appearing in your testimony—including, but not limited to:

- a. transcripts of each interview (edited, as appropriate, to protect participant identity);
- b. all guidance provided to moderators, including any discussion guide, (beyond what is supplied in your testimony);
- c. explanation for how participants were recruited, using what screening tool(s) with the intention of gathering participants meeting what specific and ranges of characteristics;
- d. participant profiles;
- e. description of the purpose of the IDIs together with a copy of the “Summary of Topics” (TR-2 at 47) provided to participants or potential recruits;
- f. copies of any documents used during the IDIs;
- g. any documents sharing partial or complete results;
- h. all contracts involved; and
- i. each participant’s responses to all questions in the Appendix 2 of your testimony (excepting those necessary to preserve any confidentiality promised, in which case a unique identity should nonetheless be associated with each interview).

USPS/APWU-RT2-5. Please refer to pages 10-11 of your testimony, *Key Findings*.

- a. Please explain what effort, if any, was undertaken to focus participants upon “customer runoff” caused only by the proposed changes in First-Class Mail service standards, or upon the specific changes proposed in this docket.
- b. Please explain in detail the foundation for, and analytical steps involved in, the comparison between your qualitative results and those of the quantitative research you refer to as “abandoned.” Include in your explanation how you were able to distinguish between results that would be “more consistent” from those that might be “much more consistent.”

c. Please cite to any examples in academic literature that support the empirical path you explain in response to part (b) that supports the making of such comparisons and how it applies to the comparison that you made.

d. Discussion of which specific questions elicited information useful to inform the conclusions stated in the last two sentences of *Key Findings* number 2?

e. What statements made by respective participants offer support, within *Key Findings* number 3, for:

- 1) The first sentence;
- 2) The second sentence up to the semicolon;
- 3) The rest of the second sentence;
- 4) What characteristics of the response to subpart (e)(2) compared to the response to subpart (e)(3) led you to conclude that the latter was “more important”?
- 5) Does the last clause of that second sentence (“requiring the USPS to perform better”) reflect your own conclusion, or does it also derive from specific participant statements? If the latter, please identify those statements supporting the statement.